

2010 California Diesel Fuel Reformulation - Seeking A Low Carbon Fuel Standard (LCFS) Public Process

We, the undersigned, support a public process for developing a new diesel fuel recipe in 2010. As end-users, the California Health & Safety Code protects us from the introduction of new diesel fuel recipes which are not vetted. This is because of the catastrophic engine failures and price spikes occurring in 1993 due to the lack of in-use testing. While the fuel recipe in 1993 was disclosed, the lack of compatibility between legacy engines and the new fuel caused serious financial harm to diesel users statewide. In light of existing state law, we are seeking the following milestones to be met prior to a new recipe or renewable standard required for 2010. Getting it right is simple; the state has to follow the law and : 1) provided the industry with the new recipe or pathway, 2) conduct testing of no less than 30 diesel vehicles ranging from 1998 to 2009 in partnership with diesel users, 3) disclose the use of any renewable fuel additive or process that lowers carbon intensity in diesel fuel and disclose the source of the products origin, 4) determine the incremental cost per gallon of each recipe at the rack each year until 2020. If CARB moves ahead without the above legal milestones completed we collectively are seeking STATE INDEMNIFICATION FOR END USERS.

State indemnification will protect us from unrecoverable price spikes and engine failure caused by an untested and recklessly implemented fuel reformulation. Credit is not available to end-users to finance another poorly thought out recipe like the 1993 reformulation. Please get it right the first time by meeting or exceeding the criteria outlined above. Thank you for considering the California jobs impacted by this risky proposal.

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